

# PISANCHYN LAW FIRM

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April 16, 2014

The United States District Court for the Middle District of PA  
The Honorable Richard P. Conaboy  
235 North Washington Avenue  
Scranton, PA 18503

Re: *Clemens v. New York Central Mutual Insurance, et al.*  
Docket #: 3: 13-CV-02447

Dear Judge Conaboy:

I am writing to advise this Honorable Court of an ongoing discovery disputes between the parties for which Plaintiffs require this Honorable Court's involvement.

In accordance with local rules, Plaintiff's counsel contacted defense counsel in a good faith effort to resolve the discovery disputes in an effort to resolve by agreement these issues without the intervention of the court.

Plaintiffs' counsel will make themselves available at the Court's convenience for a discovery conference. If the Court would prefer that Plaintiff file a more formal motion seeking a Court order, we will gladly do so.

Respectfully submitted,

M. Lee Albright, Esquire

LA/jvh

cc: Bryon R. Kaster, Esquire  
Charles E. Haddick, Jr., Esquire

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